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ATTORNEYS FOR PLAINTIFF

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Young Hee Park**

Plaintiff,

vs.

**Armando Perez d/b/a Vega's Beauty  
Salon**, an individual; **Andrew Chiao**, an  
individual; and Does 1-10 inclusive,

Defendants.

**CASE No. 8:17-CV-00335-AG-AS**

**APPLICATION FOR ENTRY OF  
DEFAULT JUDGMENT BY  
COURT AGAINST DEFENDANT  
ANDREW CHIAO**

Date: February 12, 2018  
Time: 10:00 AM  
Ctm: 10D

To Defendant Andrew Chiao and the attorneys of record, if any: Please take notice that on February 12, 2018, at 10:00 a.m., or as soon thereafter as this matter may be heard by this Court located at 411 West 4th Street, Santa Ana, California. Plaintiff Young Hee Park will present her application for default judgment against Defendant Andrwe Chiao. The Clerk has previously entered the default on Defendant Andrew Chiao, on June 13, 2017.

At the time and place of hearing, plaintiff will present proof of the following matters: (1) Defendant Andrew Chiao is not a minor or incompetent person or in military service or

1 otherwise exempted under the Solider and Sailor's Civil Relief Act of 1940; (2) Defendant  
2 Andrew Chiao has not appeared in this action; and (3) Plaintiff is entitled to judgment against  
3 said Defendants on account of the claims pleaded in the complaint, to wit: a violation of the  
4 Americans with Disabilities Act, and the Unruh Civil Rights Act.

5 The Plaintiff seeks a judgment in the amount of \$8,000.00 in statutory damages and  
6 \$4,625.00 in attorney fees and costs as set forth in the attached declaration of Jong Yun Kim and  
7 an Order directing the defendant to: provide compliant accessible parking spaces at the property  
8 located at or about 12083 Garden Grove Boulevard, Garden Grove, California. This application  
9 is based on this notice, the declarations submitted in support of this motion, and other matters  
10 which may be presented at the hearing.

11 Notice of this the original application for default judgment by court was served on  
12 Defendant Andrew Chiao, on January 8, 2018, by first class United States Mail, postage prepaid.

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14 DATED: January 9, 2018

Respectfully submitted,

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16 /s/ Jong Yun Kim  
17 Law Offices of Jong Yun Kim  
18 Attorneys for Plaintiff  
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